

IN THE UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF INDIANA
INDIANAPOLIS DIVISION

ESTATE OF ELEANOR NORTINGTON,)

Plaintiff,)

v.)

CITY OF INDIANAPOLIS, LANE COOPER,)

ROBERT HALEY, JR., JUSTIN HYDE,)

BRUCE JACKSON, AND)

RONALD MONDAY,)

Defendants.)

Case No. 1:21-cv-406-TWP-TAB

AFFIDAVIT OF ROBERT HALEY JR

I, Robert Haley Jr, being duly sworn and under oath, testifies that:

1. I am over the age of eighteen.
2. I am competent to testify about the facts in this affidavit, and it is based on my personal knowledge.
3. I am a patrol officer for the Indianapolis Metropolitan Police Department ("IMPD") and have been so employed since June 2014.
4. On February 6, 2019, I was working within the course and scope of my employment with the City of Indianapolis when I responded to a call for service at the church where Eleanor Northington was having a mental crisis, disrupting the church service, and physically assaulting people.
5. Officers, including myself, were attempting to conduct an immediate detention of Ms. Northington so she could be taken to the hospital and obtain

whatever treatment was recommended by medical professionals.

6. I sustained injuries to my head when Ms. Northington punched me in the face with her closed fist when I approached her to introduce myself upon arrival to the church.
7. I assisted in getting Ms. Northington detained in three sets of handcuffs. During this time, because of her size, her strength, and her active and violent resistance – including attempting to bite, spit, and pull away from the officers – it took a few minutes, and substantial effort, to detain Ms. Northington in the church pews.
8. I did not use any physical force on Ms. Northington or take any actions to restrain her once we moved her to the ground – where she continued to actively resist by kicking, fighting, squirming, spitting, and biting.
9. I monitored Ms. Northington and the other officers who tried to restrain and subdue her as she actively resisted while they were on the ground.
10. I was standing over the group during this time.
11. I saw Officer Lane Cooper place his knee on or near Ms. Northington's lower back while she continued resisting arrest by kicking, fighting, squirming, spitting, and biting.
12. I immediately told Officer Cooper to remove his knee.
13. As I monitored and observed the situation, I was able to see that Officer Cooper – who has a thin, skinny build – had not placed a majority of or his entire weight the knee which was briefly on Ms. Northington's back.

14. I was not charged with any criminal offense for my February 6, 2019 conduct.

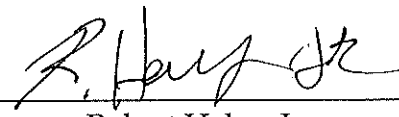
15. An internal affairs ("IA") investigation conducted by IMPD also concluded that I did not violate any of IMPD's rules, regulations, or general orders.

FURTHER AFFIANT SAYETH NAUGHT.

AFFIRMATION

I hereby affirm under the penalties of perjury that the foregoing representations are true to the best of my knowledge and belief.

3-23-22
Dated


Robert Haley, Jr.